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Attorneys for Defendant

6 State Farm Mutual Automobile Insurance Company

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9  
10 **KAREN BRAMWELL-THOMAS,**  
11 **individually**

12 **Plaintiff,**

13 **v.**

14 **STATE FARM MUTUAL AUTOMOBILE**  
15 **INSURANCE COMPANY, an entity licensed**  
16 **to do business in Nevada; DOES I through X;**  
17 **and ROE CORPORATIONS, XI through XX,**  
18 **inclusive**

19 **Defendants**

2:23-cv-01188-RFB-BNW

**STIPULATION TO EXTEND**  
**DISPOSITIVE MOTION AND**  
**PRE-TRIAL ORDER**  
**DEADLINES**  
**(THIRD REQUEST)**

20 Pursuant to Local Rule IA 6-1 and II 26-3, Defendant State Farm Mutual  
21 Automobile Insurance Company and Plaintiff Karen Bramwell-Thomas, by and  
22 through their respective counsel of record, stipulate to a 45-day extension of the  
23 dispositive motion and pre-trial order deadlines. This is the second such request



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1 for an extension of these deadlines, and it is entered in good faith without any  
2 intent to delay.

3       Discovery Complete to Date

- 4       1. Plaintiff served initial disclosures and four supplements thereto;  
5       2. Defendant served initial disclosures and two supplements thereto;  
6       3. The parties have conduct written discovery;  
7       4. Deposition of State Farm's 30(b)(6) designee;  
8       5. Deposition of Leann Grauer;  
9       6. Deposition of Plaintiff

10       There is no further discovery to be completed, but the parties have scheduled  
11 a mediation with Hon. Trevor Atkin at Advanced Resolution Management that is  
12 set for February 3, 2025. The parties wish to avoid the expense of preparing  
13 dispositive motions if the mediation is successful. Therefore, the parties have  
14 stipulated to the following extension of the dispositive motion and pre-trial order  
15 deadline.

16                               **Proposed Schedule**

17

<b>Deadlines</b>	<b>Current Dates</b>	<b>Proposed Dates</b>
Dispositive Motions	12/13/2024	3/7/2025
Pre-Trial Order	1/13/2025	4/7/2025

18

19       All parties agree that the requested extension of the dispositive motion and  
20 pre-trial order deadlines is necessary to provide all parties times to complete  
21 discovery in this matter and have an opportunity to file any necessary motions.  
22  
23



1 DATED January 15, 2025

DATED January 15, 2025

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**HENNESS & HAIGHT INJURY**  
**LAW**

4  
5 /s/ Sean D. Cooney

/s/Dallin Knecht

6 SEAN D. COONEY, ESQ.  
7 Attorneys for Defendant  
8 State Farm Mutual Automobile  
9 Insurance Company

MARK G. HENNESS, ESQ.  
STEPHEN J. MENDENHALL, ESQ.  
DALLIN KNECHT, ESQ.  
Attorneys for Plaintiff  
Karen Bramwell-Thomas

10 **ORDER**

11 **IT IS SO ORDERED.**

12  
13  
14  
15 

16 **RICHARD F. BOULWARE, II**  
17 **UNITED STATES DISTRICT JUDGE**

18 **DATED:** The 16th of January, 2025.  
19  
20  
21  
22  
23



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**CERTIFICATE VIA CM/ECF**

Pursuant to FRCP 5, I hereby certify that I am an employee of CARMAN COONEY FORBUSH, PLLC, and that on January 15, 2025, I caused to be served via CM/ECF a true and correct copy of the document described herein.

**Document Served:**

**STIPULATION TO EXTEND DISPOSITIVE MOTION AND PRE-TRIAL ORDER DEADLINES (THIRD REQUEST)**

**Person(s) Served:**

Mark G. Henness, Esq.  
Stephen J. Mendenhall, Esq.  
**HENNESS & HAIGHT INJURY LAW**  
8872 Spanish Ridge Ave.  
Las Vegas, Nevada 89148  
Attorney for Plaintiff,  
Karen Bramwell-Thomas

/s/Brittany Turner

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## Brittany Turner

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**From:** Dallin Knecht <Dallin@hennessandhaight.com>  
**Sent:** Wednesday, January 15, 2025 3:10 PM  
**To:** Sean D. Cooney; Kelley Huff; Stephen Mendenhall  
**Cc:** Brittany Turner; KarenBramwellThomasZ6040023@projects.filevine.com  
**Subject:** Re: Bramwell-Thomas v SFMAIC

Hi Sean,

You can sign and file for me. Thanks.

-Dallin

---

**From:** Sean D. Cooney <seanc@cooneyforbush.com>  
**Sent:** Wednesday, January 15, 2025 9:20 AM  
**To:** Dallin Knecht <Dallin@hennessandhaight.com>; Kelley Huff <Kelley@hennessandhaight.com>; Stephen Mendenhall <StephenM@hennessandhaight.com>  
**Cc:** Brittany Turner <brittany@ccfattorneys.com>; KarenBramwellThomasZ6040023@projects.filevine.com <KarenBramwellThomasZ6040023@projects.filevine.com>  
**Subject:** RE: Bramwell-Thomas v SFMAIC

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Attached is a draft of the SAO to continue the deadlines. I know in Stephen's email that he propose 2/28 for the dispositive motion cutoff and 3/28 for the pre-trial order. But, I'm on vacation from 3/20 to 3/31, so I pushed everything out an additional week. Does that work?

Sean D. Cooney | Partner



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— PLLC —

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Our address and phone numbers remain the same.